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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

SARAH ANDERSON,  
FABIAN GOMEZ,  
EPIFANIO RAMIREZ,  
WENDY LABUDA,  
WILLIAM OWEN,  
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: December 12, 2022  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on December 12, 2022.
2. By this stipulation, defendants now move to continue the status conference until February 27, 2023 at 9:00 a.m., and to exclude time between December 12, 2022, and February 27, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs. The government is also in the process of making

1 available to the defense video surveillance evidence for multiple controlled drug buys.

2 b) Counsel for defendants have met with their clients to discuss their respective  
3 cases. Defense counsel desire additional time to conduct investigation into the charges, the  
4 alleged roles of their respective clients, and to review discovery in this case. Defense counsel  
5 will need additional time to discuss potential resolutions with their clients, prepare pretrial  
6 motions, and otherwise prepare for trial.

7 c) Counsel for defendants believe that failure to grant the above-requested  
8 continuance would deny them the reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of December 12, 2022 to February  
16 27, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
17 Code T4] because it results from a continuance granted by the Court at defendant's request on  
18 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
19 best interest of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
22 must commence.

23 IT IS SO STIPULATED.

24 Dated: December 2, 2022

PHILLIP A. TALBERT  
United States Attorney

25  
26 /s/ JAMES R. CONOLLY  
JAMES R. CONOLLY  
27 Assistant United States Attorney

28 Dated: December 2, 2022 *[Signatures continue on following page.]*

/s/ DANIEL B. OLMOS

DANIEL B. OLMOS  
Counsel for Defendant  
SARAH ANDERSON,

Dated: December 2, 2022

/s/ DAVID D. FISCHER  
DAVID D. FISCHER  
Counsel for Defendant  
FABIAN GOMEZ

Dated: December 2, 2022

/s/ OLAF HEDBERG  
OLAF HEDBERG  
Counsel for Defendant  
EPIFANIO RAMIREZ

Dated: December 2, 2022

/s/ TASHA CHALFANT  
TASHA CHALFANT  
Counsel for Defendant  
WENDY LABUDA

Dated: December 2, 2022

/s/ JOHN R. MANNING  
JOHN R. MANNING  
Counsel for Defendant  
WILLIAM OWEN


Dated: December 2, 2022

/s/ TAMARA SOLOMON  
TAMARA SOLOMON  
Counsel for Defendant  
JOALEEN ROGERS,

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: December 5, 2022

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE